

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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_____	)	Chapter 11
In re:	)	
	)	Case No. 22-11068 (KBO)
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
	)	
Debtors.	)	
	)	
	)	
	)	
_____	)	

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

**NOTICE OF FILING OF SUPPORTING DECLARATIONS RE MOTION FOR  
STATUS CONFERENCE AND LIMITED ADMINISTRATIVE RELIEF REGARDING  
FTT**

Movant, Kihyuk Nam, respectfully submits this Notice of Filing to place into the record (i) a set of new short declarations tailored to Movant's pending motion for a status conference and limited administrative relief regarding FTT, and (ii) a compendium of prior declarations filed in the related District Court appeal and four Statements of Support filed on this Court's docket at D.I. 23047, 23048, 23049, and 23366. Movant offers Exhibit B here solely to illustrate background and holder interest. Movant does not ask the Court to adopt any statements in Exhibit B that exceed the limited administrative scope of the present motion.

Movant's underlying motion seeks narrow, post-confirmation administrative process only: a brief status conference; a meet-and-confer and joint status report within thirty (30) days on a one-time, opt-in, zero-impact in-kind pathway for FTT under appropriate safeguards; short interim preservation pending that report; and, in the alternative, a brief show-cause schedule under section 554(b). The motion does not seek reconsideration of prior rulings or any change

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<sup>1</sup> Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

to Plan distributions, reserves, class treatment, or timing.

New declarations (Exhibit A). Exhibit A contains 10 new, signed declarations from FTT holders submitted under 28 U.S.C. § 1746. Each declarant states support for the narrow administrative relief and confirms willingness to accept safeguards for any optional, one-time, opt-in in-kind pathway, including: (i) sanctions/KYC screening (using existing records with only light updates as required), (ii) recipient-pays on-chain network fees, and (iii) a written acknowledgment that any delivery would not be a “distribution on account of” Class 17 and would be accepted as-is, with no recourse.

Prior declarations compendium (Exhibit B). Exhibit B is a true and correct copy of fifty-one (51) declarations that were previously filed by holders in the related District Court appeal (D. Del. Case No. 1:24-cv-01175-TLA) and (ii) four Statements of Support filed on this Court’s docket at D.I. 23047, 23048, 23049, and 23366.

No additional relief requested by this Notice. This Notice submits Exhibits A and B for the Court’s convenience in connection with Movant’s pending motion. No separate relief is requested herein.

Dated: September 2, 2025  
Incheon, South Korea

Respectfully submitted,

**KIHYUK NAM**

/s/ Kihyuk Nam

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**CERTIFICATE OF SERVICE**

I certify that on September 2, 2025, I served a copy of this notice by email on counsel for the FTX Recovery Trust and the Office of the United States Trustee.

Dated: September 2, 2025  
Incheon, South Korea

Respectfully submitted,

**KIHYUK NAM**

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